

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Policies, Procedures, and Rules for
Development of Distribution Resources
Plans Pursuant to Public Utilities Code
Section 769.

Rulemaking R.14-08-013

**COMMENTS OF THE GREEN POWER INSTITUTE
ON THE DRP DRAFT GUIDANCE DOCUMENT**

December 12, 2014

Gregory Morris, Director
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
fax: (510) 644-1117
gmorris@emf.net

COMMENTS OF THE GREEN POWER INSTITUTE ON THE DRP DRAFT GUIDANCE DOCUMENT

Pursuant to the November 17, 2014, *Assigned Commissioner's Ruling re Draft Guidance for Use in Utility AB 327 (2013) Section 769 Distribution Resource Plans*, as modified by the November 26, 2014, email Ruling by ALJ Sullivan, in Proceeding R-14-08-013, the **Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769**, the Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the DRP Draft Guidance Document*.

One of the prime motivations for legislative passage of AB 327 was the vision that the electric system of the future will be heavily based on distributed resources of various kinds, and that the integrated-distribution system needed to support that system is structurally very different than the system that is in service today. In order to facilitate the transition to the anticipated distributed-energy systems of the future, it was felt that a new paradigm for distribution-system planning was needed. The first three parts of the Draft Guidance Document do a good job of embracing this new vision of the future, more-distributed-energy oriented system. However, in the opinion of the GPI, the fourth part of the Draft Guidance Document, which provides the core instructions to the utilities for preparing the DRPs, is too rooted in and constrained by the present system, and insufficiently focused on developing the distributed-energy system of the future.


Most of the instructions in Part Four of the Draft Guidance Document concern the determination of locational values and optimal locations for distributed resources on the utilities' existing electric-distribution systems. In the opinion of the GPI, while a determination of optimal locations on the existing grid is the correct starting point for the planning process, it is only the starting point. The determination needs to go well beyond the existing system to look at what the future system might look like for various segments

of a utility's distribution system, particularly those segments that are expected to see extensive distributed resource development. In our understanding of the legislative intent, one of the major purposes for performing the AB 327-mandated Distribution Resource Plans is to try to anticipate where there will be strong consumer demand for distributed resources of various kinds in the future, and thereby attempt to facilitate the development of distribution grids that will accommodate the anticipated consumer-driven future buildout.

In our opinion, Part Four of the Draft Guidance Document focuses almost exclusively on trying to determine where there are immediate opportunities for the deployment of DRs, without the need for distribution-system upgrades. The real value of the distribution-system planning process envisioned in AB 327 should be focused on characterizing the expected distributed-energy-rich system of the future, and identifying a roadmap to transition from the existing system to the future system. The GPI would like to see a much greater orientation on envisioning the distributed-energy future in Part Four of the final Guidance Document, and providing a realistic and feasible pathway to get there.

Dated December 12, 2014

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Gregory Morris", is written over a horizontal line.

Gregory Morris, Director
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
e-mail: gmorris@emf.net